

NEW JERSEY INDIVIDUAL HEALTH COVERAGE PROGRAM CODE OF ETHICS

I. GENERAL PRINCIPLES

The Board of Directors of the New Jersey Individual Health Coverage Program, a State agency created by N.J.S.A. 17B:27A-2 et seq., adopts the following Code of Ethics pursuant to the New Jersey Conflicts of Interest Law, N.J.S.A. 52:13D-12, et seq.

The New Jersey Conflicts of Interest Law, N.J.S.A. 52:13D-12 et seq., and the regulations of the Executive Commission on Ethical Standards adopted therefrom, governs the conduct of State officials and employees and Special State officers and employees. In enacting the Conflicts of Interests Law, the Legislature determined that to ensure propriety and preserve public confidence, persons serving in government should have the benefit of specific standards to guide their conduct, and of some disciplinary mechanism to ensure the uniform maintenance of those standards amongst them. N.J.S.A. 52:13D-12(b). Therefore, to guide and govern the conduct of Members, Employees and Agents of the New Jersey Individual Health Coverage Program, the following Code of Ethics is hereby adopted.

The New Jersey Individual Health Coverage Program Board expressly recognizes that citizens who serve in government cannot and should not be expected to be without any personal interest in the decisions and policies of government, that citizens who are government officials and employees have a right to private interests of a personal, financial and economic nature, and that standards of conduct should separate those conflicts which are unavoidable in a free society from those which are substantial and material, or which bring government into disrepute.

The New Jersey Individual Health Coverage Program Board further recognizes that Members of the Board have been appointed or elected because they represent interests directly affected by the Program they administer and this Code of Ethics should be applied and interpreted accordingly. Specifically, carriers elected to the Board are expected to bring, through their Designated Representatives, their interests and expertise in how to implement reforms and regulate the individual health benefits market. A carrier's Designated Representative is a paid employee who, as a Board Member, makes decisions and implements policies that may have a direct impact on the carrier. Representatives of employers are expected to bring the perspective of the employer. Similarly, Board Members appointed because of their roles as consumers or representatives of organized labor have been named to the Board because of their interest in the work of the Board. The structure of the Board should ensure that no single interest dominates, and the spectrum of interests represented should enhance the creation of sound public policy. Accordingly, Board Members should not be expected to separate themselves from the views and interests of the carrier, or interest group to which the law has assigned a role in implementing the IHC Program, as long as their actions do not conflict with the law. Where Board Members' views conflict with the law or Board policy, the Board Members should not be restricted by this Code of Ethics from seeking redress, in their private capacities, before the Legislature or the Courts.

This Code of Ethics is not intended to penalize a carrier or other Board Member for agreeing to serve the State of New Jersey in a volunteer capacity. Therefore, the provisions have been narrowly tailored to ensure that Board Members not be restricted in their activities beyond the degree essential to avoid conflicts of interest or undue influence.

Nothing in this Code of Ethics shall alter or impair restrictions on the conduct of Board Members, Employees or Agents imposed by the Conflicts of Interest Law or any other applicable statute. It is recommended that all Board Members, Employees and Agents of the Program familiarize themselves with the provisions of the Conflicts of Interest Law.

Any Board Member, Employee or Agent should seek an opinion from the Executive Commission on Ethical Standards when it is uncertain whether a proposed interest or activity would conflict with the established guidelines contained in the following Code of Ethics or the New Jersey Conflicts of Interest Law.

II. DEFINITIONS

As used in this Code of Ethics, and unless a different meaning clearly appears from the context, the following terms shall have the following meaning:

a. "Agent" means any consultant or other independent contractor retained by the Board of Directors of the New Jersey Individual Health Coverage Program and any employee of such consultant or independent contractor.

b. "Board" means the Board of Directors of the New Jersey Individual Health Coverage Program; the Board is a State agency as that term is defined by the New Jersey Conflicts of Interest Law.

c. "Carrier Member" means a carrier, as defined in N.J.S.A.17B:27A-2, which has been elected as a Member of the Board of Directors of the Individual Health Coverage Program, pursuant to N.J.S.A.17B:27A-10.

d. "Designated Representative" means an employee of a Carrier Member who has been designated by the Carrier Member as either its primary or its alternate representative on the Board. A Designated Representative is a Special State officer as that term is defined by the Conflicts of Interest Law.

e. "Employee of the Board" means any person holding permanent, regular employment with the New Jersey Individual Health Coverage Program; an employee of the Board is a State officer or employee as that term is defined by the New Jersey Conflicts of Interest Law.

f. "Executive Director" means the executive director of the New Jersey Individual Health Coverage Program.

g. "Member" means a member of the Board of Directors of the Individual Health Coverage Program; the term includes Carrier Members and Non-carrier Members.

h. "Non-carrier Member" means a Member of the Board of Directors of the Individual Health Coverage Program other than a Carrier Member. A Non-carrier Member is a Special State officer as that term is defined by the Conflicts of Interest Law. See N.J.S.A. 52:13D-13e.i

"Program" means the New Jersey Individual Health Coverage Program, as established by N.J.S.A.17B:27A-2 et seq.

j. "Recusal" means the process by which a person is disqualified, or disqualifies himself or herself, from a matter because of a conflict of interest, including if a person is so advised by the Board's counsel or the ethics liaison officer.

k. "Relative" means a spouse, parent, child, sibling, grandparent, grandchild, uncle aunt, nephew, niece, father-in-law, mother-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, or first cousin, whether in whole or half blood, by marriage, adoption or natural relationship, and the spouse of any such person.

l. "Special State officer or employee" means (1) any person holding an office or employment in a State agency, excluding an interstate agency, for which office or employment no compensation is authorized or provided by law, or no compensation other than a sum in reimbursement of expenses, whether payable per diem or per annum, is authorized or provided by law; (2) any person, not a member of the Legislature, holding a part-time elective or appointive office or employment in a State agency, excluding an interstate agency, or (3) any person appointed as a New Jersey member to an interstate agency the duties of which membership are not full-time. See N.J.S.A. 52:13D-13e.

m. "State agency" means any of the principal departments in the Executive Branch of the State Government, and any division, board, bureau, office, commission, or other instrumentality within or created by such department, and any independent State authority, commission, instrumentality or agency.

n. "State officer or employee" means any person, other than a special State officer or employee (1) holding an office or employment in a State agency, excluding an interstate agency, other than a member of the Legislature or (2) appointed as a New Jersey member to an interstate agency. See N.J.S.A. 52:13D-13b.

o. “State official” means any State officer or employee or special State officer or employee as defined in the Conflicts of Interest Law, N.J.S.A.52:13D-13b. or N.J.S.A.52:13D-13e. Any dispute as to the meaning of any of the above terms, or any other terms or phrases as used in this Code of Ethics, shall be resolved by reference to the New Jersey Conflicts of Interest Law and, where applicable, the Individual Health Insurance Reform Act.

III. ACCEPTANCE OF GIFTS

a. (1) No Employee, Designated Representative or Member of the Board shall accept from any person, whether directly or indirectly and whether by himself or through his spouse or any Relative, or through any partner or associate, any gift, favor, service, employment or offer of employment or any other thing of value which he knows or has reason to believe is offered to him with intent to influence him in the performance of his public duties and responsibilities. This section shall not apply to a Designated Representative’s acceptance of salary or other compensation from a Carrier Member which is the Designated Representative’s employer. This section shall not apply to the acceptance of contributions to the campaign of an announced candidate for elective public office. See N.J.S.A. 52:13D-14.

(2) No Employee, Designated Representative or Member of the Board shall accept any gift, favor, service or other thing of value under circumstances for which it might be reasonably inferred that such gift, service or other thing of value was given or offered with a purpose of influencing him in the discharge of his official duties. This section shall not apply to a Designated Representative’s acceptance of salary or other compensation from a Carrier Member which is the Designated Representative’s employer. See N.J.S.A. 52:13D-23(e)(6).

b. No Employee, Designated Representative or Member of the Board shall solicit, receive or agree to receive, whether directly or indirectly, any compensation, reward, employment, gift or other thing of value from any source other than the State of New Jersey, for any service, advice, assistance or other matter related to his official duties, except reasonable fees for speeches or published works on matters within his official duties, and, in connection therewith, reimbursement of actual expenditures for travel and reasonable subsistence for which no payment or reimbursement is made by the State of New Jersey. This section shall not apply to a Designated Representative’s acceptance of salary or other compensation from a Carrier Member which is the Designated Representative’s employer. This section shall not apply to the solicitation or acceptance of contributions to the campaign of an announced candidate for elective public office. See N.J.S.A. 52:13D-24.

IV. APPEARANCES BEFORE THE STATE AND THE BOARD

a. (1) No Employee, Designated Representative or Non-carrier Member of the Board, nor any partnership, firm or corporation in which he has an interest, nor any partner, officer or employee of any such partnership, firm or corporation, shall represent, appear for, or negotiate on behalf of, or agree to represent, appear for, or negotiate on behalf of, any person or party other than the State in connection with any cause, proceeding, application or other matter (which term shall include discussions of potential violations of the insurance laws), pending before the Board. See N.J.S.A. 52:13D-16(a). This section shall not apply to a Designated Representative’s submission of written filings and reports required to be filed with the Board pursuant to N.J.A.C. 11:20-1.1 et seq.

Subparagraph (1) shall not apply with respect to matters of general applicability or concern to the individual health coverage market or to the health care industry as a whole, including but not limited to, the adoption of regulations generally applicable to health insurance companies, health service corporations, hospital service corporations, medical service corporations and/or health maintenance organizations. However, with respect to consideration by a committee of the Board or the Board of any specific cause, proceeding, application, or other matter involving a Member, the Designated Representative or Non-carrier Member shall recuse himself.

Such Recusals shall be memorialized in the minutes prior to any discussion of the matter, and shall specify the reason for and the date of the recusal. The Recusal shall involve, during a public portion

of the meeting, abstention from discussing or voting on such specific cause, proceeding, application, or other matter involving the Member, and the recused Member shall be seated with the audience. The recused Member must leave the room at a non-public portion of the meeting during which the matter in question is under discussion.

The Recusal of a Designated Representative or Non-carrier Member of the Board shall not constitute a waiver of any rights of appeal under applicable rules or laws, and as permitted under this Code of Ethics. In accordance with such rights of appeal, a person other than the Designated Representative may appear on behalf of the Carrier Member before the Board with respect to such cause, proceeding, application, or other matter involving the Carrier Member.

b. No Employee of the Board, nor any partnership, firm or corporation in which he has an interest, nor any partner, officer or employee of any such partnership, firm or corporation shall represent, appear for or negotiate on behalf of, or agree to represent, appear for, or negotiate on behalf of, any person or party other than the State in connection with any cause, proceeding, application or other matter pending before any State agency. See N.J.S.A. 52:13D-16(a).

c. No Employee of the Board, nor any partnership, firm or corporation in which he has an interest, nor any partner, officer or employee of any such partnership, firm or corporation, shall represent, appear for, or negotiate on behalf of, or agree to represent, appear for or negotiate on behalf of any person or party other than the State in any negotiations, the acquisition or sale by the State or a State agency of any interest in real or tangible or intangible personal property, or in any proceedings relative to such acquisition or sale before a condemnation commission or court; provided, however, nothing contained in this section shall be deemed to prohibit any person from representing himself in negotiations or proceedings concerning his own interest in real property. See N.J.S.A. 52:13D-15.

d. Nothing in this section shall be deemed to prohibit an Employee, Designated Representative or Non-carrier Member of the Board from representing, appearing for or negotiating on behalf of, or agreeing to represent, appear for, or negotiate on behalf of, any person or party other than the State in connection with any proceeding pending before any State agency other than the Board, any proceeding pending before any court of record of this State, any proceeding in regard to a claim for compensation arising under Chapter 15 of Title 34 of the revised statutes (Workers' Compensation), any proceeding in connection with the determination or review of transfer inheritance or State taxes, any proceeding in connection with the filing of corporate or other documents in the Office of the Secretary of State, any proceeding on behalf of a county, municipality or school district or any authority, agency or commission of any thereof except where the State is an adverse party in the proceeding and provided he is not holding any office or employment in the State agency in which any such proceeding is pending, or any proceeding before any of the following, or any successor thereof: the Division on Civil Rights, the New Jersey State Board of Mediation, the New Jersey Public Employment Relations Commission, or the Unsatisfied Claim and Judgment Fund Board solely for the purpose of filing a notice of intention pursuant to P.L.1952, c. 174, S.5 (C. 39:6-65), See N.J.S.A. 52:13D-16(c).

V. CONTRACTING WITH THE STATE

a. No Employee, Designated Representative or Non-carrier Member of the Board having duties or responsibilities in connection with the purchase or acquisition of property or services by the Board, shall knowingly himself, or by his partners or through any corporation which he controls or in which he owns or controls more than 10% of the stock, or by any other person for his use or benefit or on his account, undertake or execute, in whole or in part, any contract, agreement, sale or purchase of the value of \$25.00 or more, made, entered into, awarded or granted by any State agency; provided, however, that the provisions of this subsection shall not apply to (a) purchases, contracts, agreements or sales which (1) are made or lent after public notice and competitive bidding or which (2), pursuant to section 5 of chapter 48 of the laws of 1944 (C. 52:34-10), may be made, negotiated or awarded without public advertising or bids, or (b) any contract of insurance entered into by the director of the Division of Purchase and Property pursuant to section 10 of article 6 of chapter 112 the laws of 1944 (C. 52:27B-62),

if such purchases, contracts or agreements, including change orders and amendments thereto, shall receive prior approval of the Executive Commission on Ethical Standards if an Employee of the Board or any Designated Representative or Non-carrier Member of the Board having duties or responsibilities in connection with the purchase or acquisition of property or services by the Board has an interest therein. See N.J.S.A. 52:13D-19.

b. No Employee, Designated Representative or Non-carrier Member of the Board shall act as officer or agent for a State agency for the transaction of any business with himself or with a corporation, company, association or firm in the pecuniary profits of which he has an interest (except that ownership or control of 10% or less of the stock of a corporation shall not be deemed an interest within the meaning of this subsection). See N.J.S.A. 52:13D-20.

VI. OUTSIDE EMPLOYMENT AND OTHER INTERESTS

a. Employees of the Board shall disclose all business activity or outside employment to the Executive Director, or his designee (or, in the case of business activity or outside employment undertaken by the Executive Director, to the Chairperson of the Board), prior to being undertaken, and shall be subject to his approval. The Executive Director or Chairperson of the Board, as applicable, shall forward a copy of such disclosure to the Executive Commission on Ethical Standards. All Employees of the Board who have any interest in organizations doing business with the State shall file an annual report with the Executive Director, or his designee (or, in the case of the Executive Director, with the Chairperson of the Board) detailing the extent of their interest in any such organizations. Any Employee of the Board may submit such a disclosure report to the Executive Commission on Ethical Standards for an opinion as to whether such outside interest or activity conflicts with the guidelines established in this Code of Ethics or with the Conflicts of Interest Law. "Business activity" as used in this section shall not include stockholdings unless the share held represents a majority holding or unless the stock held is in a company or interest that is involved with health insurance.

b. No Employee, Designated Representative or Non-carrier Member of the Board shall have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity, which is in substantial conflict with the proper discharge of his duties in the public interest. N.J.S.A. 52:13D-23(e)(1).

c. Any Employee, Designated Representative or Non-carrier Member of the Board who engages in any particular business, profession, trade or occupation which is subject to licensing or regulation by a specific agency of State Government shall file notice of such activity with the Executive Commission on Ethical Standards. See, N.J.S.A. 52:13D-23(e)(2). A copy of this notice shall be furnished to the Executive Director (or, in the case of Executive Director, to the Chairperson of the Board).

d. No Employee, Designated Representative or Non-carrier Member of the Board shall undertake any employment or service, whether compensated or not, which might reasonably be expected to impair his objectivity and independence of judgment in the exercise of his official duties. See, N.J.S.A. 52:13D-23(e)(5).

e. No Employee, Designated Representative or Non-carrier Member of the Board shall act in his official capacity in any matter wherein he has a direct or indirect personal, financial interest that might reasonably be expected to impair his objectivity or independence of judgment. See N.J.S.A. 52:12D-23(e)(4).

f. It is the policy of the Board that Employees, Designated Representatives, and Non-carrier Members disclose to the Board any actual or potential conflict of interest. Questionnaires making such disclosure in compliance with this policy shall be filed annually with the Executive Director (or, in the case of the Executive Director, with the Chairperson of the Board). It shall be the continuing responsibility of all Employees, Designated Representatives and Non-carrier Members to promptly report to the Executive Director, (or, in the case of the Executive Director, to the Chairperson of the Board), any activity or interest which may pose an actual or potential conflict of interest. Any Employee, Designated

Representative, or Non-carrier Member may seek an opinion from the Executive Commission on Ethical Standards when it is uncertain whether a proposed outside interest or activity would conflict with the established guidelines contained herein, or contained in the Conflicts of Interest Law, or would require disclosure pursuant to this Code or the Conflicts of Interest Law.

VII. MISUSE OF OFFICIAL POSITION OR INFORMATION

a. No Employee, Designated Representative or Member of the Board (including both a Carrier Member and Non-carrier Member) shall willfully disclose to any person, whether or not for pecuniary gain, any information not generally available to members of the public which he receives or acquires in the course of and by reason of his official duties. No Employee, Designated Representative or Member (including both a Carrier Member and a Non-carrier Member) of the Board shall use for the purpose of pecuniary gain, whether directly or indirectly, any information not generally available to members of the public which he receives or acquires in the course of and by reason of his official duties. See N.J.S.A. 52:13D-25.

b. Nothing in this section shall preclude an Employee, Designated Representative or Member of the Board (including both a Carrier Member and Non-carrier Member) from disseminating non-public information to employees of the carrier or entity they represent.

c. No Employee, Designated Representative or Member of the Board (including both a Carrier Member and Non-carrier Member) shall use or attempt to secure unwarranted privileges or advantages for himself or others. See N.J.S.A. 52:13D-23(e)(3).

VIII. APPEARANCE OF IMPROPRIETY

Employees, Designated Representatives and Members (including both Carrier Members and Non-carrier Members) of the Board shall at all times strive to hold the respect and confidence of the people. No Designated Representative, Member (including both a Carrier Member and Non-carrier Member) or Employee of the Board shall knowingly act in any way that might reasonably be expected to create an impression or suspicion among the public having knowledge of his or her acts that he or she may be engaged in conduct violative of his or her trust as a special State officer or employee. See N.J.S.A. 52:13D-12(a) and N.J.S.A. 52:13D-23(e)(7).

IX. POST-EMPLOYMENT RESTRICTIONS

No Employee, Designated Representative or Non-carrier Member of the Board, subsequent to the termination of his office or employment, shall represent, appear for or negotiate on behalf of, or provide information not generally available to the members of the public, or provide services to, or agree to represent, appear for, or negotiate on behalf of, or provide information not generally available to the members of the public, or provide services to, whether by himself or through any partnership, firm or corporation in which he has an interest or through any partner, officer or employee thereof, any person or party other than the State in connection with any cause, proceeding, application or other matter with respect to which such Employee, Designated Representative or Non-carrier Member of the Board shall have made any investigation, rendered any ruling, given any opinion, or had been otherwise substantially and directly involved at any time during the course of his office or employment. Any person who willfully violates the provisions of this subsection is a disorderly person, and shall be subject to a fine not to exceed \$500.00 or imprisonment not to exceed 6 months, or both. See N.J.S.A. 52:13D-17.

X. CASINO RELATED RESTRICTIONS

a. As used in this section "person" means any State officer or employee subject to financial disclosure by law or executive order and any other State officer or employee with responsibility for matters affecting Casino activity; and any Special State officer or employee with responsibility for matters affecting Casino activity. Any question regarding the definition of "person" as used in this

section shall be resolved by reference to the definition of that term as contained in the Conflicts of Interest Law at N.J.S.A. 52:13D-17.2(a).

b. No Employee of the Board, nor any person, nor any Relative of any Employee of the Board, nor any partnership, firm or corporation with which any such Employee or person is associated or in which he has an interest, nor any partner, officer, director or employee while he is associated with such partnership, firm or corporation, shall hold, directly or indirectly, an interest in, or hold employment with, or represent, appear for or negotiate on behalf of, any holder of, or applicant for, a Casino license, or any holding or intermediary company with respect thereto in connection with any cause, application, or matter, except that a Relative of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the Executive Commission on Ethical Standards, the Joint Legislative Committee on Ethical Standards, or the Supreme Court, as appropriate, such employment will not interfere with the responsibilities of the State officer or employee, or person, and will not create a conflict of interest, or reasonable risk of the public perception of a conflict of interest, on the part of the State officer or employee, or person. See N.J.S.A. 52:13D-17.2(b).

c. No Designated Representative or Non-carrier Member of the Board shall hold, directly or indirectly, an interest in, or hold employment with, or represent, appear for, or negotiate on behalf of, any holder of, or applicant for, a Casino license, or any holding or intermediary company with respect thereto, in connection with any cause, application, or matter except when such interest is held or activities are carried out by the Member of the Board as an employee of such entity. See N.J.S.A. 52:13D-17.2(b).

d. No person or Relative, nor any partnership, firm or corporation with which such person is associated or in which he has an interest, nor any partner, officer, director or employee while he is associated with such partnership, firm or corporation, shall within 2 years next subsequent to the termination of the office or employment of such person, hold, directly or indirectly, an interest in, or hold employment with, or represent, appear for or negotiate on behalf of, any holder of, or applicant for, a Casino license in connection with any cause, application or matter, or any holding or intermediary company with respect to such holder of, or applicant for, a Casino license in connection with any phase of Casino development, permitting, licensure or any other matter whatsoever related to Casino activity, except that a Relative of a person may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the Executive Commission on Ethical Standards, the Joint Legislative Committee on Ethical Standards, or the Supreme Court, as appropriate, such employment will not interfere with the responsibilities of the person and will not create a conflict of interest, or reasonable risk of the public perception of a conflict of interest, on the part of the person. See N.J.S.A. 52:13D-17.2(c).

e. This section shall not apply to the spouse of an Employee of the Board, which Employee is without responsibility for matters affecting Casino activity, who becomes the spouse subsequent to the Employee's appointment or employment and who is not individually or directly employed by a holder of, or applicant for, a Casino license, or any holding or intermediary company. See N.J.S.A. 52:13D-17.2(d).

f. The requirements of this section notwithstanding, in the event that the Legislature amends, repeals or suspends Section 4 of P.L.1981, c.142 (C. 52:13D-17.2), in whole or in part, the companion sections of this Code shall to the same extent be deemed amended, repealed or suspended.

g. No Employee, Designated Representative or Member (including both a Carrier Member and Non-carrier Member) of the Board shall solicit or accept, directly or indirectly, any complimentary service or discount from any casino applicant or licensee which he knows or has reason to know is other than a service or discount that is offered to members of the general public in like circumstances. N.J.S.A. 52:13D-17.2(f).

XI. INDUCEMENT TO VIOLATE CODE OF ETHICS

No person shall induce or attempt to induce any Employee, Designated Representative, or Member (including both a Carrier Member and a Non-carrier Member) of the Board to violate any provision of the Conflicts of Interest Law or this Code of Ethics. Any person who willfully violates any

provision of this section is a disorderly person, and shall be subject to a fine not to exceed \$500.00 or imprisonment not to exceed 6 months, or both. See N.J.S.A. 52:13D-26.

XII. EXECUTIVE COMMISSION ON ETHICAL STANDARDS

a. The Executive Commission on Ethical Standards is responsible for enforcing the Conflicts of Interest Law and interpreting its provisions. It has jurisdiction to initiate, receive, hear and review complaints concerning violations of the Conflicts of Interest Law or this Code of Ethics, and is authorized to render advisory opinions as to whether a given set of facts and circumstances would constitute a violation of those provisions.

b. Any Employee, Designated Representative or Member (including both a Carrier Member and a Non-carrier Member) of the Board found guilty by the Commission of a violation of any provision of the Conflicts of Interest Law or of this Code of Ethics may be fined not less than \$100.00 or more than \$500.00 and may be suspended from his office or employment by order of the Commission for a period of not in excess of 1 year. If the Commission finds that the conduct of such Employee, Designated Representative or Member (including both a Carrier Member and a Non-carrier Member) constitutes a willful and continuous disregard of the provisions of the Conflicts of Interest Law or of this Code of Ethics, it may order such person removed from his office or employment and may further bar such person from holding any public office or employment in this State in any capacity whatsoever for a period not exceeding 5 years. See N.J.S.A. 52:13D-21.

CERTIFICATION

I hereby certify that the foregoing Code of Ethics was duly adopted by the New Jersey Individual Health Coverage Program at its meeting conducted February 11, 2003.

Wardell Sanders, IHC Program Executive Director

DATE: _____

ATTEST:

Ellen DeRosa, IHC Program Deputy Executive Director

**NEW JERSEY INDIVIDUAL HEALTH COVERAGE PROGRAM
("IHC PROGRAM")
CONFLICT OF INTEREST QUESTIONNAIRE**

1. Are you currently engaged in any business, trade, profession, part-time or full-time employment outside of or in addition to your position with the IHC Program?

Yes _____ No _____

If yes, describe in detail the duties of your outside work, name and address of each employer, type of service provided, number of hours worked per week, and method of compensation (salary or commission).

2. Do you have any business interest(s), either public or private, i.e., are you a principal stockholder or partner in an outside business? Yes _____ No _____

If yes, describe in detail your property holdings and/or connections with firms including location, name, degree of interest, (e.g. partner, owner).

3. Are you self-employed, i.e., do you have a private practice? Yes _____ No _____

If yes, describe in detail the service you provide, the trade name and location of your business.

4. List all professional licenses you have (e.g. real estate, planning, architecture, law, accounting engineering) and indicate whether such license is active.

If the profession, trade, or occupation is subject to licensing or regulation by a State government agency, you must file notice of such activity with the IHC Board who will forward notification to the Executive Commission on Ethical Standards.

5. All IHC Board Employees are required to notify the Executive Director (or, in the case of the Executive Director, the Chairperson of the Board) of their intent to seek elective office and/or to accept appointed office. This includes, but is not limited to, the following examples - township/city committee or council, school board, planning board, sewer authority, board of freeholders, etc.

A copy of this information shall be forwarded to the Executive Commission on Ethical Standards. The information you supply is not considered confidential. The Executive Commission on Ethical Standards and/or IHC Board, as appropriate, will review the information and you will be notified if there is any conflict of interest.

Signature _____

Date _____